

EXHIBIT A

Proposed Curative Instruction

You may have heard argument or evidence suggesting that Ms. Carroll—by revealing in June 2019 that Mr. Trump had sexually assaulted her—assumed the risk that he would respond with defamatory statements, consented to such defamatory statements, or authorized Mr. Trump to make such statements as a form of self-defense. I instruct you, as a matter of law, that Ms. Carroll did not consent to Mr. Trump’s defamatory statements, or otherwise grant him lawful permission to defame her, by publicly stating in June 2019 that he had sexually assaulted her. As I have instructed you, it has already been established that Mr. Trump’s statements were false and defamatory, and the only questions for you concern what harm, if any, Mr. Trump’s statements caused Ms. Carroll, and, if they did cause her harm, what damages Mr. Trump must pay.